

# Akin Gump

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May 21, 2016

Ramona R. Cotca, Esq.  
Judicial Watch, Inc.  
425 Third Street, SW  
Suite 800  
Washington, DC 20024

Re: Judicial Watch, Inc. v. Dep't of State, Case No. 13-1363 (D.D.C.)  
Deposition of Bryan Pagliano noticed for June 6, 2016

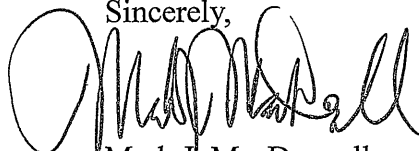
Dear Ms. Cotca,

As you know, we represent Bryan Pagliano. Last week we accepted service on behalf of our client of a Rule 45 subpoena, dated May 12, 2016, that was issued in the captioned case (the "Subpoena"). The Subpoena calls for Mr. Pagliano to appear and testify at a deposition to be taken on June 6, 2016.

We have read the Memorandum and Order issued by the Court in this case on May 4, 2016 and have noted, in particular, the limitations on the scope of discovery articulated in Section III. A. We are writing to inform you that, with the advice of counsel, Mr. Pagliano will decline to answer any and all questions that may be put to him in the scheduled deposition in reliance on his rights under the Fifth Amendment to the U.S. Constitution. Given Mr. Pagliano's stated intention, and in order to avoid the unnecessary waste of resources and undue imposition on Mr. Pagliano's time, we would ask that Judicial Watch, Inc. withdraw the Subpoena and excuse Mr. Pagliano from appearing on June 6, 2016.

Please let us know if you require any additional information or if there are aspects of this matter that we should discuss by telephone.

Sincerely,



Mark J. MacDougall  
Sean D'Arcy  
Constance O'Connor  
Connor Mullin